

EXHIBIT

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RINA OH n/k/a RINA OH AMEN,

Plaintiff,

vs.

VIRGINIA L. GIUFFRE,

Defendant.
-----X

COMPLAINT

Case No.: ____ CV ____

Plaintiff Demands a
Trial by Jury

Plaintiff RINA OH n/k/a/ RINA OH AMEN (“Plaintiff”), by her attorneys, the Meyerowitz Law Firm, as and for her Complaint against defendant VIRGINIA L. GIUFFRE (“Defendant”), alleges as follows:

THE PARTIES

1. Plaintiff Rina Oh n/k/a Rina Oh Amen is an individual who was and is a citizen of the State of New Jersey, United States.

2. Defendant Virginia L. Giuffre is an individual who was and is a citizen of the State of Colorado, United States.

JURISDICTION AND VENUE

3. This Court has subject matter, i.e., diversity jurisdiction, over this action pursuant to 28 USC § 1332(a)(2) as the amount in controversy exceeds the sum or value

of \$75,000, exclusive of interest and costs, and this controversy is between citizens of different states.

4. This Court has personal jurisdiction over Defendant, pursuant to New York’s long arm statute NYCPLR 302(a), as Defendant has committed the tortious actions complained of herein in this State by making the defamatory statements related to Plaintiff herein that were published in this State on her twitter account and other platforms and publishing outlets. Defendant has also availed herself of the jurisdiction and use of this Court in commencing an action on August 09, 2021 in the matter entitled *Virginia Giuffre v. Prince Andrew*, 21 cv 06702, United States District Court, Southern District of New York.

5. Venue is proper pursuant to 28 USC §1391 for reasons similar to this Court having personal jurisdiction over Defendant on the grounds that, among other reasons, including, but not limited to, that: (i) a substantial part of the events and/or wrongful conduct that give rise to the claims alleged herein occurred in this District, i.e., amongst other reasons, the publishing and dissemination of Plaintiff’s defamatory statements; (ii) Plaintiff suffered the effects and damages of Defendant’s defamatory statements in this venue; and (iii) Defendant has availed herself of the use of this Court as set forth above.

FACTUAL ALLEGATIONS

6. Today, Plaintiff is married and a respected and well regarded artist.

7. However, twenty years ago, during some or all of the years 2000 and 2001, starting when Plaintiff was only around (21) twenty-one years’ old, Plaintiff was solicited, manipulated, exploited, abused, and sex trafficked by the notorious Jeffrey Epstein (“Epstein”), and his co-conspirators, Ghislaine Maxwell (“Maxwell”) and others.

8. Defendant knew or should have known that, at all relevant times, Plaintiff was a young victim of Epstein and not a co-conspirator of Epstein or a part of his inner circle of criminals (as concluded by the authorities, including the FBI).

9. Defendant knew or should have known that, just as Defendant claims purportedly happened to her, at all times, Plaintiff was being used, abused, exploited and manipulated by Epstein and his inner circle.

10. During that time in 2000 and 2001, Plaintiff was introduced by Epstein or Maxwell to Defendant and Plaintiff and Defendant spoke and saw each other on only a few occasions in Palm Beach, Florida and few occasions in New York.

11. On no occasion did Plaintiff sexually abuse or assault Defendant, or cut Defendant, and Defendant knows this to be true.

12. In the last 20 years, since Defendant and Plaintiff last saw each other in 2001, Defendant has never accused Plaintiff of any bad or criminal acts from that time.

13. However, recently Defendant began falsely and wrongly defaming and slandering Plaintiff on numerous occasions.

14. For instance, Defendant maintains a Twitter account under the handle and account name “Virginia Giuffre” at URL <https://twitter.com/VRSVirginia>.

15. On October 28, 2020, on, by and through her Twitter account, Defendant wrote certain tweets, and then, by hitting send, Defendant published and broadcast those tweets out to the world.

16. Said tweets, amongst others, with time stamps when Defendant published them, contained the following statements of fact that Defendant knew or should have known to be false:

- a. Virginia Giuffre @VRSVirginia “Ladies & Gentlemen meet Rina who now is pleading innocence since there’s a \$VCF\$ she has decided to come out as a victim, when on the record she was #Epstein’s GF”& was rewarded with \$\$ in trade for victims- real victims. May karma be upheld and justice be done.” @FBI @nytimes Butterfly
<https://twitter.com/MoonProfessor/status/1321613698637598720> 9:24 PM
 Oct 28, 2020 Twitter for iPhone
<https://twitter.com/VRSVirginia/status/1321623957183684610>

- b. Virginia Giuffre @VRSVirginia Oct 28, 2020 “Rina- if you read this I hope you live in shame for the rest of your life. You don’t intimidate me any longer & the physical & mental scares you left me with should be enough to put your a** in jail, my line in the sand is drawn & your guilty! #LockHerUp” 7:03 PM Oct 28, 2020 Twitter for iPhone
<https://twitter.com/VRSVirginia/status/1321588495467491328>

- c. Virginia Giuffre @VRSVirginia Oct 28, 2020 “Jeffrey Epstein 'recruiter' admits bringing girls but denies abuse” Pathetic excuses from a deranged woman who was NO victim & should be sitting in jail next to #GhislaineMaxwell Rina-woman to woman, now that I am a woman, U disgust me. @DailyMail” 7:21 PM · Oct 28, 2020·Twitter for iPhone
<https://twitter.com/VRSVirginia/status/1321593015622758405>

- d. Virginia Giuffre @VRSVirginia “What really makes sense is that Rina, a co-conspirator for #Epstein & #GhislaineMaxwell would go on to marry a fellow co-conspirator involved with #MichaelJackson . 2 sick peas in a pod, you can’t even imagine how beyond sickened I feel right now. @pinkPeptobismol @teresajhelm” 7:59 PM · Oct 28, 2020·Twitter for iPhone <https://twitter.com/VRSVirginia/status/1321602627554045953>
- e. Virginia Giuffre @VRSVirginia “This picture that Rina painted with the sliced leg bleeding is exactly what she used to do to me, I have a 6 inch scar on my left leg from her cutting me. I can let a lot of s**t go, but this I will never forget. #PureEvil #LockHerUp” @FBI @thedailybeast @nytimes #Justice” Drop of bloodFolded handsButterfly 8:09 PM · Oct 28, 2020 Twitter for iPhone <https://twitter.com/VRSVirginia/status/1321605000628371456>
- f. Virginia Giuffre @VRSVirginia “Still being robbed of justice- just ask all the men & women I’ve named in my court docs why they still have their freedom to carry on with their untainted lives why I sit here crying my eyes out over rerun & rerun of the abusers still affecting my life.” @FBI @SDNYnews #unfair Butterfly 8:34 PM · Oct 28, 2020·Twitter for iPhone <https://twitter.com/VRSVirginia/status/1321611245712150533>
- g. Virginia Giuffre @VRSVirginia “Design from 2000-2002 and classically trained in sculpture,” Uh Rina- those were the years in which you procured & partook in the abuse of minors with #Epstein Did he pay for

that too? Your no survivor, your an oxygen thief. A virus on humanity.”

#Karma

#Justice

<https://twitter.com/MoonProfessor/status/1321611635258134528> 9:13 PM

Oct 28, 2020 Twitter for iPhone

<https://twitter.com/VRSVirginia/status/1321621244144312320>

17. The foregoing statements are and were maliciously false, and Defendant knew them to be false when she published them.

18. Plaintiff did not do the things that Defendant accuses her in these Tweets. Plaintiff is and always was a victim and not a co-conspirator of Epstein and his gang. Plaintiff never cut, sexually assaulted or sexually abused Defendant. Plaintiff was and is guilty of no crime, and has never been charged with one.

19. Considering the high profile nature of the Jeffrey Epstein, Ghislaine Maxwell and Prince Andrew story, Defendant knew that accusing Plaintiff, a fellow victim, of such horrible things, that it would maximize the spread and harm and damage to Plaintiff, thereby making it more malicious and damaging.

20. Defendant has maliciously reiterated and republished these defamations and slanders in prior and subsequent tweets and interviews on podcasts, TV and for magazines, as well as in her memoirs entitled Billionaire’s Playboy Club.

21. These defamations and slanders by Defendant are causing Plaintiff great harm.

22. Plaintiff commences this action against Defendant to stop Defendant from continuing to spew here false and defamatory bile and to hold Defendant accountable for the damages she knowingly has caused Plaintiff.

FIRST CAUSE OF ACTION

(DEFAMATION)

23. Plaintiff hereby repeats and realleges the allegations state above as if fully forth herein.

24. As set forth in detail above and herein, Defendant wrote and spoke certain statements of fact that she knew or should have known were false, and indeed were said by Defendant with knowledge and malicious disregard for the truth.

25. Said defamatory statements were created, written, spoken published and broadcast by Defendant, amongst other places, on her Twitter account and through a podcast, for third-parties and all the world to read, see and hear.

26. Said defamatory statements by Defendant were then picked up by major news organizations, like the NY Post, Vogue, and Daily Beast, as Defendant knew they would, and republished throughout the world news media, TV, and the world wide web.

27. Though these statements are false, and even when Plaintiff prevails herein, they will never die and will live in the internet forever, forever causing Plaintiff injury.

28. Defendant had no privilege, absolute, qualified or otherwise, to make said defamatory statements.

29. Defendant's defamatory statements directly and proximately caused Plaintiff to suffer compensatory damages related to both economic and non-economic damages, including, but not limited to, the following: loss of earnings and income, loss of business

and contracts, loss of business and economic opportunities, damages to Plaintiff's name, reputation, and character, and business and standing in the community, as well as for pain and suffering, humiliation, shame, disgrace, mental anguish, loss of enjoyment of life, and anxiety and extreme emotion distress, amongst other things

30. Accordingly, Plaintiff is entitled to an award of compensatory damages in an amount to be determined at the trial, but in no event less than Ten Million (\$10,000,000) Dollars.

31. In light of the malicious, intentional and/or willful nature of Defendant's actions, Plaintiff is entitled to punitive damages, in an amount to be determined at trial, but believed to be in excess of Ten Million (\$10,000,000) Dollars.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial as provided by Rule 38(a) of the Federal Rules of Civil Procedure.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief on the counts stated above as against Defendant as follows:

a. On the First Cause, that Plaintiff be awarded compensatory damages in an amount to be determined at trial and which is otherwise incalculable at this time, but is not less than Ten Million (\$10,000,000) Dollars;

b. On the First Cause of Action, that Plaintiff be awarded punitive damages in an amount to be determined at trial, but in no event less than Ten Million (\$10,000,000) Dollars;

c. That Plaintiff be awarded its attorneys' fees and costs under statutory and common law;

d. That Plaintiff be awarded pre- and post-judgment interest cost and disbursements; and

e. That Plaintiff be awarded all other and further relief as the Court may deem just and proper.

Date: New York, New York
October 28, 2021

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